

Distribution Integrity Management Program (DIMP)

Operator of Gas Distribution System

Marathon Pipeline LLC

Operator ID: **32147**
Operator: **MARATHON PIPE LINE LLC**
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Inspection ID: **37**
Report Date: **9/18/2014**
Inspection Date: **9/16/2014**
States(s) included in this Inspection:
Illinois

Agency Representatives:

James Watts, Illinois Commerce Commission, 2174149609,
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Persons Interviewed:

Richard Abraham, Compliance, 4194212290,
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Inspector Comments:

Q. No.:	Rule Name:	Question	Answer	Details	Comments
1	192.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	Yes or Satisfactory	The operator had a plan in place by 8/2/2011. The operator has retained this plan and other versions.	The operator had a plan in place by 8/2/2011. The operator has retained this plan and other versions.
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan? Commercial product(s)/templates name if used:	Yes or Satisfactory Fully	SHRIMP was utilized to establish the plan. SHRIMP	SHRIMP was utilized to establish the plan.
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	Yes or Satisfactory	Responsibility of the program is defined in Chapter 1 on pages 2-3.	Responsibility of the program is defined in Chapter 1 on pages 2-3.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
4	192.1007(a) (1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: This is defined in inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? Operating Conditions (e.g. pressure, gas quality, etc.)? Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	Design (e.g. type of construction, Staff confirmed the Yes or Satisfactory	Knowledge of the system located in Chapter 3 on page 3 of the plan. This is defined in Chapter 3 which references design, construction, operation and maintenance records of the system and from data reported in the PHMSA annual reports. They receive pipeline Quality Gas from their supplier Ameren Illinois. Staff reviewed records indicating the MAOP and material types and cathodic protection.	Yes or Satisfactory MAOP, design and materials used in the construction of the 4 inch service line by reviewing documents provided by Marathon.
5	192.1007(a) (2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?	Yes or Satisfactory	This is defined in Chapter 3 of the plan on page 3.	This is defined in Chapter 3 of the plan on page 3.
6	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?	Electronic - Paper - SME	This is defined in Chapter 3 on page 3.	This is defined in Chapter 3 on page 3.
7	192.1007(a) (3)	Electronic, Paper, SME Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	Marathon identified they were not correctly identifying the number of one call tickets associated with the service line. This has been corrected and no further gaps have been identified. This is defined in C of Chapter 11.1 on page 12.	Marathon identified they were not correctly identifying the number of one call tickets associated with the service line. This has been corrected and no further gaps have been identified. This is defined in C of Chapter 11.1 on page 12.
8	192.1007(a) (3)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	Marathon identified they were not correctly identifying the number of one call tickets associated with the service line. This has been corrected and no further gaps have been identified. This is defined in C of Chapter 11.1 on page 12.	Marathon identified they were not correctly identifying the number of one call tickets associated with the service line. This has been corrected and no further gaps have been identified. This is defined in C of Chapter 11.1 on page 12.
9	192.1007(a) (3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	Yes or Satisfactory	This is defined in 11.1 on page 11.	This is defined in 11.1 on page 11.
10	192.1007(a) (5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	Yes or Satisfactory	This is defined in A of 11.1 on page 11.	This is defined in A of 11.1 on page 11.
11	192.1007(a) (5)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	Yes or Satisfactory	This is defined in A of 11.1 on page 11.	This is defined in A of 11.1 on page 11.
12	192.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element “Knowledge of the System”?	Yes or Satisfactory	Review of the system records and documentation maintained by the operator indicate they have adequate knowledge of the System. This is defined in Chapter 3 on page 3.	Review of the system records and documentation maintained by the operator indicate they have adequate knowledge of the System. This is defined in Chapter 3 on page 3.
13	192.1007(a)	Has the operator demonstrated an understanding of its system?	Yes or Satisfactory	Review of the system records and documentation maintained by the operator indicate they have adequate knowledge of the System. This is defined in Chapter 3 on page 3.	Review of the system records and documentation maintained by the operator indicate they have adequate knowledge of the System. This is defined in Chapter 3 on page 3.
14	192.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline?			
		Corrosion	Yes or Satisfactory	This is defined in 4.2.1 on pages 4-5.	The above threats are considered and the procedures are defined in 4.2 on pages 4-8.
		Natural Forces	Yes or Satisfactory	This is defined in 4.2.6 on page 8.	
		Excavation Damage	Yes or Satisfactory	This is defined in 4.2.3 on pages 6-7.	
		Other Outside Force Damage	Yes or Satisfactory	This is defined in 4.2.7 on page 8.	
		Material or Welds	Yes or Satisfactory	This is defined in 4.2.5 on pages 7-8.	
		Equipment Failure	Yes or Satisfactory	This is defined in 4.2.2 on page 5-6.	
		Incorrect Operation	Yes or Satisfactory	This is defined in 4.2.4 on page 7.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Other Concerns	Yes or Satisfactory	This is defined in 4.2.8 on page 8.	
15	192.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	Yes or Satisfactory	Review of the documentation and records provided by the Marathon, indicates they have utilized all of the reasonably available information to identify the existing and potential threats.	Review of the documentation and records provided by the Marathon, indicates they have utilized all of the reasonably available information to identify the existing and potential threats.
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?		Subdivision was not utilized by Marathon due to the small size of the system and limited materials utilized in the construction of the service line. Subdivision is allowed by SHRIMP and the procedure is defined in C of 11.3 on pages 29-30 of the plan.	Subdivision was not utilized by Marathon due to the small size of the system and limited materials utilized in the construction of the service line. Subdivision is allowed by SHRIMP and the procedure is defined in C of 11.3 on pages 29-30 of the plan.
17	192.1007(b)	Incident and leak history	Yes or Satisfactory	To complete the interview questions in 11.2 of SHRIMP the operator must review the associated information to identify threats. The requirement for retaining this information is defined in the appropriate sections of the O&M. There have been no reportable leaks or incidents on the Marathon system since the system was installed.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Corrosion control records	Yes or Satisfactory	Corrosion records to be retained are defined in the applicable sections of the O&M for Corrosion. These are reviewed during the interview questions defined in 11.2 of SHRIMP.	
		Continuing surveillance records	Yes or Satisfactory	Records required for continuing surveillance are defined in the applicable sections of the O&M for Continuing Surveillance. The records are utilized to answer interview questions in SHRIMP to identify applicable threats.	
		Patrolling records	Yes or Satisfactory	Records for Patrolling are defined in the applicable sections of the O&M. These records are utilized to answer interview questions in SHRIMP to identify applicable threats.	
		Maintenance history	Yes or Satisfactory	Records required for maintenance history are defined in each applicable section dealing with maintenance history. This would also be established through review of annual report information. These documents are reviewed prior to answering the interview questions utilized by SHRIMP.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Excavation damage experience	Yes or Satisfactory	Records required for excavation damage are defined in the applicable section of the O&M. This is reviewed to established if this has occurred on the system prior to completing the interview questions utilized by SHRIMP.	
		Other – Describe	Yes or Satisfactory	They monitor the Mississippi river stage for flooding.	
		In identifying threats did the information considered include any of the following?	Yes or Satisfactory		The above information is considered when identifying threats.
18	Information Only	Does the plan categorize primary threats as either “system-wide” or “localized”?	All System-wide	Due to small size of the system, all threats are applied system wide.	Due to small size of the system, all threats are applied system wide.
19	Information Only	Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	Yes or Satisfactory	This is defined in 4.1 of Chapter 4 on page 4.	This is defined in 4.1 of Chapter 4 on page 4.
20	192.1007(b)	Does the documentation provided by the operator demonstrate implementation of the element “Identify Threats”?	Yes or Satisfactory	Review of documentation provided by the operator demonstrates implementation of the element identify threats.	Review of documentation provided by the operator demonstrates implementation of the element identify threats.
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool?	Fully	Fully using SHRIMP.	Fully using SHRIMP.
		Commercial tool name if used:			
22	192.1007(c)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	Yes or Satisfactory	This is defined in 11.3.2 and utilizes a risk ranking model located on pages 31-34.	This is defined in 11.3.2 and utilizes a risk ranking model located on pages 31-34.
23	192.1007(c)	Do the written procedures to evaluate and rank risk consider: Each applicable current and potential threat?			
		Corrosion	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.
		Natural Forces	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
		Excavation Damage	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
		Other Outside Force Damage	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
		Material or Welds	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
		Equipment Failure	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
		Incorrect Operation	Yes or Satisfactory	this is defined in 11.3 On page 27. SHRIMP utilizes an Interview process to establish threats.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Other Concerns	Yes or Satisfactory	This is defined in 11.3 on page 27. SHRIMP utilizes an interview process to establish threats.	
24	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The likelihood of failure associated with each threat?			
		Corrosion	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	The procedures defined in the plan consider the likelihood of failure associated with the above threats.
		Natural Forces	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Excavation Damage	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Other Outside Force Damage	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Material or Welds	Not Checked	This is defined in C of 11.3 on page 29.	
		Equipment Failure	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Incorrect Operation	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Other Concerns	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
25	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The potential consequence of such a failure?			
		Corrosion	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	The procedures utilized do consider the potential consequence of failure when evaluating and ranking risk.
		Natural Forces	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Excavation Damage	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Other Outside Force Damage	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Material or Welds	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Equipment Failure	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Incorrect Operation	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
		Other Concerns	Yes or Satisfactory	This is defined in C of 11.3 on page 29.	
26	192.1007(c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.	Not Applicable	Subdivision was not utilized by Marathon due to the limited size of the system. This plan is for one four inch service line. Subdivision process is defined in C of 11.3 of Chapter 11.	Subdivision was not utilized by Marathon due to the limited size of the system. This plan is for one four inch service line. Subdivision process is defined in C of 11.3 of Chapter 11.
27	Information Only	Is the method used to evaluate and rank risks reasonable?	Yes or Satisfactory	This is defined in B and C of 11.3 in Chapter 11 on pages 29-30 of SHRIMP.	This is defined in B and C of 11.3 in Chapter 11 on pages 29-30 of SHRIMP.
28	192.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?	Yes or Satisfactory	Using SHRIMP initially no threats were identified or listed in 11.5. Marathon does indicate that there are potential threats to the system and will override SHRIMP and rank accordingly.	Using SHRIMP initially no threats were identified. Marathon does indicate that there are potential threats to the system and will override SHRIMP and rank accordingly.
29	192.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.	Yes or Satisfactory	The operator conducted the evaluation of the SHRIMP results defined in 11.5.	The operator conducted the evaluation of the SHRIMP results defined in 11.5.
30	192.1007(c)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	Yes or Satisfactory	Marathon utilized the Interview process utilized by SHRIMP which determined that all threats were equal and scored as 0. Marathon is to review and override and rank potential threats that are applicable to the system.	Marathon utilized the Interview process utilized by SHRIMP which determined that all threats were equal and scored as 0. Marathon is to review and override and rank potential threats that are applicable to the system.
31	192.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	Yes or Satisfactory	Marathon conducts weekly aerial patrols on the service installation, they have remote monitoring on the rectifier that allows for weekly reading submission and print off monthly reporting of rectifier readings or current operations. They also monitor river levels for periods of flooding. The pipeline is also patrolled after such an event to ensure adequate cover is maintained.	Marathon conducts weekly aerial patrols on the service installation, they have remote monitoring on the rectifier that allows for weekly reading submission and print off monthly reporting of rectifier readings or current operations. They also monitor river levels for periods of flooding. The pipeline is also patrolled after such an event to ensure adequate cover is maintained.
32	192.1007 (d)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	Yes or Satisfactory	Marathon conducts weekly aerial patrols on the service installation, they have remote monitoring on the rectifier that allows for weekly reading submission and print off monthly reporting of rectifier readings or current operations. They also monitor river levels for periods of flooding. The pipeline is also patrolled after such an event to ensure adequate cover is maintained.	Marathon conducts weekly aerial patrols on the service installation, they have remote monitoring on the rectifier that allows for weekly reading submission and print off monthly reporting of rectifier readings or current operations. They also monitor river levels for periods of flooding. The pipeline is also patrolled after such an event to ensure adequate cover is maintained.
34	192.1007 (d)	Locate the leaks in the distribution system;	Yes or Satisfactory	This is defined in 6.0 of the plan.	
		Evaluate the actual or potential hazards associated with these leaks;	Yes or Satisfactory	This is defined in 6.0 of the plan.	
		Act appropriately to mitigate these hazards;	Yes or Satisfactory	This is defined in 6.0 of the plan.	
		Keep records;	Yes or Satisfactory	This is defined in 6.0 of the plan.	
		Self-assess to determine if additional actions are necessary to keep people and property safe.	Yes or Satisfactory	This is defined in 6.0 of the plan.	
		Does the plan include an effective leak management program (unless all leaks are repaired when found)	Yes or Satisfactory	This is defined in 6.0 of the plan.	Marathon has adopted the GPTC guidelines for Leak Classification and action criteria and was adopted as MPL - DOT-00051-SPE.
35	192.1007 (d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	Yes or Satisfactory	Review of the plan and associated documentation provided by Marathon demonstrates implementation of measures required by 192.	Review of the plan and associated documentation provided by Marathon demonstrates implementation of measures required by 192.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
36	192.1007 (e)	Does the plan contain written procedures for how the operator established a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	This is information collected to be utilized for the annual DOT reporting.
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	This is defined in 7.1 Mandatory Performance Measures on page 9.	
37	192.1007 (e)	Does the plan establish a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	This is defined in 7.1 and 7.3 on page 9.
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
38	192.1007 (e)	v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	This is defined in 7.1 and 7.3 on page 9.	
		Does the operator have written procedures to collect the data for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.1 on page 9.	This is defined in 7.1 on page 9. Staff reviewed the 2012-2013 annual distribution reports for the system to ensure they are collecting the data. There were no leaks or third party damages.
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		Do the written procedures require the operator to monitor each performance measure?			
39	192.1007 (e)	i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.1 on page 9.	This is defined in 7.1 on page 9. Staff reviewed the 2012-2013 annual distribution reports for the system to ensure they are collecting the data. There were no leaks or third party damages.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	This is defined in 7.1 on page 9.	
40	192.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?	Yes or Satisfactory	This is defined in e of 11.3 on page 30.	This is defined in e of 11.3 on page 30. They then use the performance measures and baselines to determine effectiveness.
41	Information Only	Can the performance measures identified by the operator in the plan be counted, monitored, and supported?	Yes or Satisfactory	Yes, the performance measures in 7.1 and 11.3 utilized by SHRIMP and the operator can be counted, measured and supported.	Yes, the performance measures in 7.1 and 11.3 utilized by SHRIMP and the operator can be counted, measured and supported.
42	192.1007 (e)	Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?	Yes or Satisfactory	Review of documentation provided by the operator demonstrates implementation of Measuring Performance, Monitoring Results and Evaluating Effectiveness.	Review of documentation provided by the operator demonstrates implementation of Measuring Performance, Monitoring Results and Evaluating Effectiveness.
43	192.1007 (f)	Do the written procedures for periodic review include:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		a. This is defined in F of complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years?	Frequency of review based on the This is defined in F of	11.3 on page 31 and in Chapter 8 on Page 9.	Yes or Satisfactory 11.3 on page 31 and in Chapter 8 on Page 9.
		b. Verification of general information (e.g. contact information, form names, action schedules, etc.)?	Yes or Satisfactory	This is defined in F of 11.3 on page 31 and in Chapter 8 on Page 9.	
		c. Incorporate new system information?	Yes or Satisfactory	This is defined in F of 11.3 on page 31 and in Chapter 8 on Page 9.	
		d. Re-evaluation of threats and risk?	Yes or Satisfactory	This is defined in F of 11.3 on page 31 and in Chapter 8 on Page 9.	
		e. Review the frequency of the measures to reduce risk?	Yes or Satisfactory	This is defined in F of 11.3 on page 31 and in Chapter 8 on Page 9.	
		f. Review the effectiveness of the measures to reduce risk?	Yes or Satisfactory	This is defined in F of 11.3 on page 31 and in Chapter 8 on Page 9.	
		g. defined in F of risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)?	Modify the measures to reduce	Yes or Satisfactory 11.3 on page 31 and in Chapter 8 on Page 9.	This is
		h. defined in F of their effectiveness, and if they are not appropriate, refine/improve them?	Review performance measures,	Yes or Satisfactory 11.3 on page 31 and in Chapter 8 on Page 9.	This is
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	Yes or Satisfactory	Marathon has a management of Change process in place that would be used to notify the appropriate personnel of changes to the DIMP plan. This is T&L-HES-00068-PRS. This is located in Chapter 8.	Marathon has a management of Change process in place that would be used to notify the appropriate personnel of changes to the DIMP plan. This is T&L-HES-00068-PRS. This is located in Chapter 8.
45	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	Yes or Satisfactory	This is defined in Chapter 9 on page 10.	This is defined in Chapter 9 on page 10.
46	192.1007 (f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	Yes or Satisfactory	Review of documentation provided by the operator and revisions included in the Plan Change Log in 11.4 demonstrates periodic evaluation and improvement.	Review of documentation provided by the operator and revisions included in the Plan Change Log in 11.4 demonstrates periodic evaluation and improvement.
47	192.1007 (g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	Yes or Satisfactory	This is defined in G of 11.3 on page 31. Staff confirmed this by reviewing the annual reports for 2012-2013.	This is defined in G of 11.3 on page 31. Staff confirmed this by reviewing the annual reports for 2012-2013.
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	Yes or Satisfactory	This is defined in Chapter 9 Reporting on page 10.	This is defined in Chapter 9 Reporting on page 10.
49	192.1007 (g)	Has the operator submitted the required reports?	Yes or Satisfactory	Yes, Marathon has submitted the annual reports as required per 191. Staff confirmed this by reviewing the annual reports previously submitted by Marathon Pipeline.	Yes, Marathon has submitted the annual reports as required per 191. Staff confirmed this by reviewing the annual reports previously submitted by Marathon Pipeline.
50	192.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	Yes or Satisfactory	This is defined in Chapter 9 and in G of 11.3 of the plan. There have been no fitting failures on the service line but do have procedures for this.	This is defined in Chapter 9 and in G of 11.3 of the plan. There have been no fitting failures on the service line but do have procedures for this.
51	192.1011				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	Yes or Satisfactory	This is defined in Chapter 10 on page 10-11.	This is defined in Chapter 10 on page 10-11.
52	192.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	Yes or Satisfactory	This is defined in Chapter 10 on page 10-11. Staff confirmed that the operator is maintaining copies of prior versions of the DIMP plan.	This is defined in Chapter 10 on page 10-11. Staff confirmed that the operator is maintaining copies of prior versions of the DIMP plan.
53	192.1011	Has the operator maintained the required records?	Yes or Satisfactory	Review of the records maintained by the operator indicates they are maintaining the required records.	Review of the records maintained by the operator indicates they are maintaining the required records.
54-1	192.1007 (d)	1. For the top five highest ranked risks from the operator's risk ranking list the following: Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Excavation damage	Excavation Damage	There is a 300 foot segment that is located on public property that Marathon does not own or control access to. There have been no damages since the service line was installed. The remainder of the 2500 feet of service line is on property controlled by Marathon. Excavation Damage has been identified as a potential threat and is their #1 threat.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Third party	Third Party	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Weekly patrols, Standby Criteria, Extra Public Awareness Mailings and Use of Pipeline Markers in Class 3 Location.	
		Associated performance measure.		Track the number of leaks due to third party damage	
54-2	192.1007 (d)	2. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Incorrect Operation	Incorrect Operations	As of this inspection there have been no instances where emergency procedures have been utilized. Due to the lack of instances where they have been required to initiate emergency response on this pipeline due to damage or leakage, there is a probability of failure to follow established procedures. Due to this, Marathon has ranked this as the #2 potential Threat.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Failure to follow procedures		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Annual Training on Emergency Response.	
		Associated performance measure.		Track the number of instances due to Incorrect Operations.	
54-3	192.1007 (d)	3. For the top five highest ranked risks from the operator's risk ranking list the following:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Corrosion	Corrosion	There has been no leakage due to external corrosion on this gas pipeline since it was installed. Due to this Marathon has indicated external corrosion as their #3 potential threat.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	External – steel, coated, CP	External - steel, coated, CP	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Monthly rectifier readings, early detection of down systems and periodic close interval surveys.	
		Associated performance measure.		Track the number of instances of leakage due to external corrosion.	
54-4	192.1007 (d)	4. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Corrosion	Corrosion	As of this inspection there have been no instances of leakage or wall loss due to atmospheric corrosion. Due to this, Marathon has ranked atmospheric corrosion as the #4 potential threat.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Atmospheric	Atmospheric	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Due to the lack of instances of atmospheric corrosion having occurred on this pipeline, Marathon is monitoring per code requirement of once every 39 months not to exceed 3 calendar years.	
		Associated performance measure.		Track the number of instances of atmospheric corrosion.	
54-5	192.1007 (d)	5. For the top five highest ranked risks from the operator's risk ranking list the following: Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Natural forces	Natural Forces	There has been no previous instances of leakage or loss of cover due to flooding - natural forces. Due to this, Marathon has ranked natural forces as the #5 potential threat to the gas pipeline.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #); Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);	Water/Flood	Water/Flood	Marathon currently monitors river levels daily to determine when flooding could be a threat to the service line. Marathon conducts patrols after instances of high water to ensure pipeline cover has not been affected.
		Associated performance measure.		Track the number of instances where leakage has occurred due to natural forces.	